

A nonprofit organization providing personal marriage counseling services and conducting workshops and seminars on the subject of marital adjustment qualifies for exemption under section 501(c)(3) of the Code.

Advice has been requested whether the nonprofit organization described below qualifies for exemption from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1954.

The organization was formed to provide marriage counseling services. Referrals for counseling come from clergymen, psychiatrists physicians, attorneys, and social welfare agencies. In addition to personal counseling services, the organization runs a speaker's bureau and conducts workshops and seminars on the subject of marital adjustment.

Although directors and officers serve without compensation, marital counselors are compensated for their services. Counselors are qualified by education and experience to aid individual in understanding and resolving their difficulties. The organization's support comes from area churches, clients' fees, and contributions.

Section 501(c)(3) of the Code provides for the exemption from Federal income tax of organizations organized and operated exclusively for educational purposes.

Section 1.501(c)(3)-1(d)(3) of the Income Tax Regulations defines the term 'educational' as including the instruction of the public on subjects useful to the individual and beneficial to the community.

The organization's counseling program, together with its workshops, public lectures, and seminars, are educational in that they provide instruction on a subject useful to the individual and beneficial to the community at large. Accordingly, it is held that the organization is exempt from Federal income tax under section 501(c)(3) of the Code.

Even though an organization considers itself within the scope of this Revenue Ruling, it must file an application on Form 1023, Exemption Application, in order to be recognized by the Service as exempt under section 501(c)(3) of the Code. The application should be filed with the District Director of Internal Revenue for the district in which is located the principal place of business or principal office of the organization. See section 1.501(a)-1 of the regulations.